



STATE OF IDAHO
DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Administrator

September 16, 1999

CERTIFIED MAIL #Z 273 659 050

Joseph Muller, Director of Regulatory Compliance
WestFarm Foods
P.O. Box 79007
Seattle, Washington 98119

RE: P 9811-170-2, WestFarm Foods, Caldwell
(Tier II Operating Permit No. 027-00054)

Dear Mr. Muller:

On November 25, 1998, the Division of Environmental Quality (DEQ) received an application for a Tier II Operating Permit (OP) from WestFarm Foods (formerly Darigold). On December 18, 1998, the application was declared complete. A public comment period was held from July 30, 1999 to August 30, 1999. Comments were received from WestFarm Foods on August 30, 1999.

Based on review of the application, and all state and federal rules and regulations, DEQ finds this project meets the provisions of IDAPA 16.01.01.400 (*Rules for the Control of Air Pollution in Idaho*). Therefore, enclosed is your Tier II OP (#027-00054) for the emission sources that exist at the facility.

You are strongly encouraged to request a meeting with DEQ to discuss the permit terms and requirements with which your facility must comply. Mr. Tom Krinke of the Boise Regional Office will contact you regarding this meeting. DEQ strongly recommends that, in addition to your facility's plant manager, your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions also attend the meeting.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Sue Richards, Air Quality Permit Program Manager, at (208) 373-0502.


Sincerely,

Orville D. Green
Administrator
State Air Quality Program

ODG:SRTRL:hs G:\AH\WALUNDAH\IOPTIER.Z\WESTFARM\9811170.PL

Enclosure

cc:
R. Wilkosz
S. West, Boise Regional Office
EPA IOO
Permit File Manual
Source File (#027-00054)
COF

STATE OF IDAHO AIR POLLUTION OPERATING PERMIT GENERAL INFORMATION	<div style="text-align: center;"> PERMIT NUMBER <div style="display: flex; justify-content: center; gap: 10px;"> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">2</div> <div style="border: 1px solid black; padding: 2px 5px;">7</div> <div style="font-size: 1.2em;">-</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">5</div> <div style="border: 1px solid black; padding: 2px 5px;">4</div> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> AQCR <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">6</div> <div style="border: 1px solid black; padding: 2px 5px;">4</div> </div> <div style="text-align: center;"> CLASS <div style="border: 1px solid black; padding: 2px 5px;">A</div> <div style="border: 1px solid black; padding: 2px 5px;">2</div> </div> <div style="text-align: center;"> SIC <div style="border: 1px solid black; padding: 2px 5px;">2</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">2</div> <div style="border: 1px solid black; padding: 2px 5px;">3</div> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> ZONE <div style="border: 1px solid black; padding: 2px 5px;">1</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="font-size: 1.2em;">/</div> <div style="border: 1px solid black; padding: 2px 5px;">11</div> </div> <div style="text-align: center;"> UTM COORDINATE (km) <div style="border: 1px solid black; padding: 2px 5px;">5</div> <div style="border: 1px solid black; padding: 2px 5px;">2</div> <div style="border: 1px solid black; padding: 2px 5px;">5</div> <div style="font-size: 1.2em;">.</div> <div style="border: 1px solid black; padding: 2px 5px;">2</div> <div style="font-size: 1.2em;">,</div> <div style="border: 1px solid black; padding: 2px 5px;">4</div> <div style="border: 1px solid black; padding: 2px 5px;">8</div> <div style="border: 1px solid black; padding: 2px 5px;">5</div> <div style="border: 1px solid black; padding: 2px 5px;">5</div> <div style="font-size: 1.2em;">.</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> </div> </div>						
1.	PERMITTEE WestFarm Foods						
2.	PROJECT Tier II Operating Permit						
3.	<table style="width: 100%; border: none;"> <tr> <td style="width: 40%; border: none;">MAILING ADDRESS</td> <td style="width: 30%; border: none;">TELEPHONE #</td> <td style="width: 30%; border: none;">COUNTY</td> </tr> <tr> <td style="border: none;">P.O. Box 79007</td> <td style="border: none;">(206) 284-7220</td> <td style="border: none;">Canyon</td> </tr> </table>	MAILING ADDRESS	TELEPHONE #	COUNTY	P.O. Box 79007	(206) 284-7220	Canyon
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5.	<table style="width: 100%; border: none;"> <tr> <td style="width: 40%; border: none;">PERSON TO CONTACT</td> <td style="width: 60%; border: none;">TITLE</td> </tr> <tr> <td style="border: none;">Joseph L. Muller</td> <td style="border: none;">Director of Regulatory Compliance</td> </tr> </table>	PERSON TO CONTACT	TITLE	Joseph L. Muller	Director of Regulatory Compliance		
PERSON TO CONTACT	TITLE						
Joseph L. Muller	Director of Regulatory Compliance						
6.	EXACT PLANT LOCATION 520 Albany Street, Caldwell, Idaho						
7.	GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS Dairy Products - Production and Sales						
8.	PERMIT AUTHORITY <p>This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 16.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this permit.</p> <p>THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF DESIGN INFORMATION PRESENTED IN THE APPLICATION AND DEQ'S TECHNICAL ANALYSIS OF THE SUPPLIED INFORMATION. CHANGES IN DESIGN OR EQUIPMENT, THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MAY BE A MODIFICATION. MODIFICATIONS ARE SUBJECT TO DEPARTMENT REVIEW IN ACCORDANCE WITH SECTION 16.01.01.200 OF THE RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO.</p>						
<div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="width: 40%;">  _____ ADMINISTRATOR, STATE AIR QUALITY PROGRAM DIVISION OF ENVIRONMENTAL QUALITY </div> <div style="width: 55%;"> <div style="text-align: right; margin-bottom: 20px;"> ISSUED DATE September 16, 1999 </div> <div style="text-align: right;"> EXPIRATION DATE September 16, 2004 </div> </div> </div>							

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

WestFarm Foods
Tier II Operating Permit
Caldwell, Idaho

PERMIT NUMBER

0 2 7 - 0 0 0 5 4

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Niro Dryer

1. EMISSIONS LIMITS

1.1 Niro Dryer Stack Emissions Limits

Emissions of particulate matter (PM) and particulate matter with an aerodynamic diameter of ten (10) microns or less (PM-10) from the Niro Dryer stack shall not exceed any corresponding emission rate limit listed in Appendix A of this permit.

1.2 Niro Dryer Stack Emissions Opacity Limits

Visible emissions from the Niro Dryer stack shall not exhibit greater than twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as required by IDAPA 16.01.01.625 (*Rules for the Control of Air Pollution in Idaho*).

2. OPERATING REQUIREMENTS

2.1 Control Equipment

The Niro Dryer shall be vented to a properly functioning baghouse at all times while operating.

2.2 Pressure Drop Across the Baghouse

When the dryer is operating, the pressure drop across the Niro Dryer baghouse shall be greater than 0.5 inches of water column.

2.3 Installation of Monitoring Equipment

The Permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to continuously measure the pressure differential across the Niro Dryer Baghouse.

2.4 Material Processed

The Permittee shall process no more than 4,959 pounds per hour of condensed product through the Niro Dryer. This limit can only be exceeded upon prior approval by DEQ while conducting further emissions testing.

3. MONITORING AND RECORDKEEPING REQUIREMENTS

3.1 When the dryer is operating, the following parameters shall be monitored and recorded on a daily basis. All data shall be kept on-site, in a log, for a period of two (2) years and made available to DEQ representatives upon request.

3.1.1 Pressure drop across the Niro Dryer baghouse.

3.1.2 The amount of condensed product processed through the Niro Dryer in pounds per hour averaged over the period of each continuous batch.

3.1.3 The number of hours the Niro Dryer is operated for each continuous batch.

3.2 Within six (6) months of reaching a throughput of 4,463 pounds per hour or greater of condensed product through the NIRO Dryer, the Permittee shall perform a performance test on the Dryer stack to demonstrate compliance with the PM and PM 10 limits listed in Appendix A. The performance test shall be performed at the maximum rate of the process and in accordance with IDAPA 16.01.01.157.

ISSUED DATE: September 16, 1999
EXPIRATION DATE: September 16, 2004

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**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

WestFarm Foods
Tier II Operating Permit
Caldwell, Idaho

PERMIT NUMBER

0 2 7 - 0 0 0 5 4

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Anhydro Dyer

1. EMISSIONS LIMITS
1.1 Anhydro Dryer Stack Emissions Limits

Emissions of particulate matter (PM) and particulate matter with an aerodynamic diameter of ten (10) microns or less (PM-10) from the Anhydro Dryer stack shall not exceed any corresponding emission rate limit listed in Appendix A of this permit.

1.2 Anhydro Dryer Stack Emissions Opacity Limits

Visible emissions from the Anhydro Dryer stack shall not exhibit greater than twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as required by IDAPA 16.01.01.625 (*Rules for the Control of Air Pollution in Idaho*).

2. OPERATING REQUIREMENTS
2.1 Control Equipment

The Anhydro Dryer shall be vented to a properly functioning baghouse at all times while operating.

2.2 Pressure Drop Across the Baghouse

When the dryer is operating, the pressure drop across the Anhydro Dryer baghouse shall be maintained in accordance with manufacturer's specifications. Documentation of the manufacturer's specifications shall remain on-site at all times and shall be made available to DEQ representatives upon request.

2.3 Installation of Monitoring Equipment

The Permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to continuously measure the pressure differential across the Anhydro Dryer Baghouse.

2.4 Material Processed

The Permittee shall process no more than 9,945 pounds per hour of condensed product through the Anhydro Dryer. This limit can only be exceeded upon prior approval by DEQ while conducting further emissions testing.

3. MONITORING AND RECORDKEEPING REQUIREMENTS

3.1 When the dryer is operating, the following parameters shall be monitored and recorded on a daily basis. All data shall be kept on-site, in a log, for a period of two (2) years and made available to DEQ representatives upon request.

3.1.1 Pressure drop across the Anhydro Dryer baghouse.

3.1.2 The amount of condensed product processed through the Anhydro Dryer in pounds per hour averaged over the period of each continuous batch.

3.1.3 The number of hours the Anhydro Dryer is operated for each continuous batch.

ISSUED DATE: September 16, 1999
EXPIRATION DATE: September 16, 2004

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

WestFarm Foods
Tier II Operating Permit
Caldwell, Idaho

PERMIT NUMBER

0 2 7 - 0 0 0 5 4

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Anhydro Dyer

- 3.2 Within six (6) months after reaching a throughput of 8,951 pounds per hour or greater of condensed product through the Anhydro Dryer, the Permittee shall perform a performance test on the Dryer stack to demonstrate compliance with the PM and PM 10 limits listed in Appendix A. The performance test shall be performed in accordance with IDAPA 16.01.01.157.

ISSUED DATE: September 16, 1999
EXPIRATION DATE: September 16, 2004

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

WestFarm Foods
Tier II Operating Permit
Caldwell, Idaho

PERMIT NUMBER

0 2 7 - 0 0 0 5 4

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

L Dryer

1. EMISSIONS LIMITS
1.1 L Dryer Stack Emissions Limits

Emissions of particulate matter (PM) and particulate matter with an aerodynamic diameter of ten (10) microns or less (PM-10), from the L Dryer stack shall not exceed any corresponding emission rate limit listed in Appendix A of this permit.

1.2 L Dryer Stack Emissions Opacity Limits

Visible emissions from the L Dryer stack shall not exhibit greater than twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as required by IDAPA 16.01.01.625.

2. OPERATING REQUIREMENTS
2.1 Control Equipment

The L Dryer shall be vented to a properly functioning baghouse at all times while operating.

2.2 Pressure Drop Across the Baghouse

When the dryer is operating, the pressure drop across the L Dryer baghouse shall be greater than 0.25 inches of water column.

2.3 Installation of Monitoring Equipment

The Permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to continuously measure the pressure differential across the L Dryer Baghouse.

2.4 Material Processed

The Permittee shall process no more than 4,740 pounds per hour of condensed product through the L Dryer. This limit can only be exceeded upon prior approval by DEQ while conducting further emissions testing.

2.5 Operating Hours

The Permittee shall operate the L Dryer no more than 4,380 hours per year.

3. MONITORING AND RECORDKEEPING REQUIREMENTS

3.1 When the dryer is operating, the following parameters shall be monitored and recorded on a daily basis. All data shall be kept on-site, in a log, for a period of two (2) years and made available to DEQ representatives upon request.

3.1.1 Pressure drop across the L Dryer baghouse.

3.1.2 The amount of condensed product processed through the L Dryer in pounds per hour averaged over the period of each continuous batch.

ISSUED DATE: September 16, 1999
EXPIRATION DATE: September 16, 2004

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

WestFarm Foods
Tier II Operating Permit
Caldwell, Idaho

PERMIT NUMBER

0 2 7 - 0 0 0 5 4

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

L Dryer

- 3.1.3 The amount of hours the L Dryer is operated for each continuous batch and a running total of the hours of operation.

ISSUED DATE: September 16, 1999
EXPIRATION DATE: September 16, 2004

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**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

WestFarm Foods
Tier II Operating Permit
Caldwell, Idaho

PERMIT NUMBER

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Kewanee Model F Natural Gas Fired Boilers

1. EMISSIONS LIMITS
1.1 Boiler Emissions Limits

Emissions of particulate matter (PM) and particulate matter with an aerodynamic diameter of ten (10) microns or less (PM-10) from the two boilers shall not exceed any corresponding emission rate limit listed in Appendix A of this permit.

1.2 Boiler Opacity Limits

Visible emissions from either boiler shall not exhibit greater than twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as required by IDAPA 16.01.01.625.

2. OPERATING REQUIREMENTS

2.1 The boilers shall burn only natural gas.

2.2 The boilers shall be limited to a burner capacity of 25.1 MMBtu/hr.

ISSUED DATE:	September 16, 1999
EXPIRATION DATE:	September 16, 2004

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**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

WestFarm Foods
Tier II Operating Permit
Caldwell, Idaho

PERMIT NUMBER

0 2 7 - 0 0 0 5 4

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Appendix A

Appendix A

WestFarm Foods - Caldwell

Hourly (lb/hr) and Annual (T/yr) Point Source Emissions Limits^a

Source	PM	PM-10	
	lb/hr	lb/hr	T/yr
Niro Dryer	1.92	0.96	4.20
Anhydro Dryer	1.84	0.92	4.03
L Dryer	7.38	2.95	6.46
Two 25 MMBtu/hr Boilers	0.60	0.60	2.63
Total	10.3	5.43	17.3

- a. As determined by a pollutant specific U.S. EPA reference method, DEQ approved alternative, or as determined by DEQ's emission estimation methods used in the permit application analysis.

ISSUED DATE: September 16, 1999
EXPIRATION DATE: September 16, 2004

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TIER II OPERATING PERMIT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.
- B. The Permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The Permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 39-342A, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environmental Quality.
- E. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the Permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the Permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures which must be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e., air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 16.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the Permittee obtains prior DEQ approval.
- The Permittee shall submit a proposed test date for each performance test required by this permit to DEQ for approval at least fifteen (15) days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The Permittee shall promptly notify DEQ of any change in the proposed test date and shall provide at least five (5) working days advanced notice prior to conducting any rescheduled test, unless DEQ approves a shorter notice period.
- Within thirty (30) days of the date on which a performance test required by this permit is concluded, the Permittee shall submit to DEQ a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.
- The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by DEQ, which demonstrated compliance with the respective pollutant emission limit unless; (1) a more restrictive operating limit is specified elsewhere in this permit or; (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.
- J. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

ISSUED DATE:	September 16, 1999
EXPIRATION DATE:	September 16, 2004

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September 16, 1999

**STATE OF IDAHO DEPARTMENT OF HEALTH AND WELFARE
DIVISION OF ENVIRONMENTAL QUALITY
RESPONSES TO COMMENTS
SUBMITTED DURING A PUBLIC COMMENT PERIOD
FOR THE PROPOSED AIR QUALITY TIER II OPERATING PERMIT
FOR THE WESTFARM FOODS (FORMERLY DARIGOLD, INC.) CALDWELL FACILITY**

Introduction

A public comment period for the WestFarm Foods (formerly Darigold) permit application and proposed air quality Tier II operating permit for the Caldwell Facility was held from July 30, 1999 through August 30, 1999. Comment packages, which included the application materials, correspondence between the Division of Environmental Quality (DEQ) and WestFarm Foods concerning the permit, DEQ's technical analysis, and the proposed permit were made available for public review at the Caldwell Public Library and the DEQ regional offices in Boise. Public comments regarding the air quality aspects of the proposed permit and analysis have been summarized below.

Public Comments and DEQ Responses

Comment 1: Effective August 2, 1999, Darigold, Inc. began doing business as WestFarm Foods. Therefore, it is requested that the company name in the permit be changed accordingly.

Response to 1: The requested change has been incorporated into the Tier II operating permit.

Comment 2: Condition 3.1.1 for the two Kewanee Model F Natural Gas Fired boilers requires the amount of natural gas burned in the boilers be monitored and recorded on a monthly basis. Because the amount of fuel that can be burned in these boilers is inherently and physically limited by the burner design, and because the boilers have been permitted for maximum potential to emit, it is requested that Condition 3.1.1 be deleted and a new Condition 2.2 for the boilers be inserted that limits the burner capacity of each boiler to 25.1 MMBtu/hr.

Response to 2: The requested changes have been incorporated into the Tier II operating permit.

Comment 3: Appendix A lists a PM emission limit for the L Dryer of 5.90 lb/hr. A source test report submitted to DEQ in November 1998 provides source test data for the L Dryer showing a PM emission rate of 5.91 lb/hr. In addition, section 2.4 of the permit allows for the operation of the L Dryer at a feed rate of 120% of the source test feed rate. Therefore, it is requested that the L Dryer PM emission limit in Appendix A be adjusted to 7.09 lb/hr (120% of the source test emission rate).

Response to 3: The requested changes have been incorporated into the Tier II operating permit.

WESTFARM FOODS

RECEIVED
AUG 30 1999
DIV. OF ENVIRONMENTAL QUALITY
STATE A Q PROGRAM

August 26, 1999

VIA OVERNIGHT MAIL

Mr. Gary L. Reinbold
Air Quality Analyst
Division of Environmental Quality
1410 N. Hilton
Boise, ID 83706-1255

Re: Docket Number 10AP-9907
Tier II Operating Permit #027-00054 for:
WestFarm Foods (formerly Darigold, Inc.) - Caldwell Facility

Dear Mr. Reinbold:

This letter is being submitted as WestFarm Foods' (formerly Darigold, Inc.) formal comments to the Tier II Operating Permit referenced above, dated July 21, 1999. Thank you for the opportunity to review and comment on the permit.

WestFarm Foods' has only three comments regarding the proposed permit. Except for the first request, we have referenced our comments below to the appropriate permit sections by Item number.

Effective August 2, 1999, Darigold, Inc. began doing business as WestFarm Foods. Therefore we would like to request that the company name in the permit referenced above be changed to "WestFarm Foods".

Item 3.1 pertaining to the Kewanee Model F Natural Gas Fired Boilers on page 7. This section requires that the operator of the facility monitor and record the amount of natural gas burned in the two boilers on a monthly basis. We have previously asked the permit writer to eliminate this requirement, because the amount of fuel that can be burned in those boilers is inherently physically limited by the burner design. This physical constraint also limits emissions. The emission estimates presented in the Tier II permit application were based on this physically limited potential to emit. Requiring monthly monitoring and recording of boiler fuel consumption for two boilers that are physically limited to 25.1 MMBtu/hr. and that burn exclusively natural gas, is not cost effective protection of the environment. DEQ has not provided (in the technical memorandum or in any other response to previous comments) WestFarm Foods (Darigold, Inc.) with an explanation of the reason that our suggestion (i.e. limit burner capacity) is insufficient to protect the environment.

Therefore, we request that Condition 3.1.1 be deleted and a new Condition 2.2 for the boilers be inserted that limits the burner capacity of each boiler to 25.1 MMBtu/hr. This

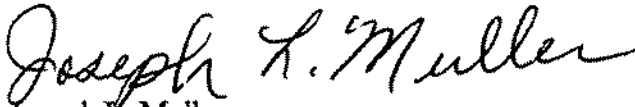
Mr. Gary L. Reinbold
August 26, 1999
Page 2

will inherently restrict gas consumption and eliminate unnecessary monitoring and record keeping requirements.

Appendix A (page 8) lists a PM emission limit for the L Dryer of 5.90 lb./hr. The permit writer may have been unaware that a source test report submitted to IDEQ in November 1998 provides source test data for the L Dryer showing a Front Half PM Emission Rate of 5.91 lb./hr (copy of Table 4 from the report is enclosed). Consequently, the proposed PM emission limit is not consistent with normal operating conditions of the L Dryer. In addition section 2.4 of this permit allows for the operation of the L Dryer at a feed rate of 4740 pounds per hour which is 120% of the source test feed rate. Therefore, in order for WestFarm Foods to be able to operate at this feed rate and still be in compliance with the permit, we request that the L Dryer PM emission limit in Appendix A be adjusted to 7.09 lb./hr (120% of the source test emission rate). That emission is within the Process Feed Rate limit for PM.

If you have any questions regarding these comments, please do not hesitate to call me at 206-286-6772. We hope you will incorporate our requests into the final Tier II Operating Permit. Thank you.

Sincerely,



Joseph L. Muller
Director of Regulatory Compliance

Cc: Dan Plinski
Krista McIntyre

Enclosure

Caldeq23

Table 4

VALID RESULTS, INC.: Particulate Matter Emission Rate Calculation Form

Client:	<u>Darigold</u>	Standard Temperature:	<u>528</u>	°Rankine
Operator:	<u>T. Prev</u>	Standard Pressure:	<u>29.92</u>	inches mercury
Plant Location:	<u>Caldwell, Idaho</u>	Pitot Tube Coefficient (C_p):	<u>0.84</u>	dimensionless
Source:	<u>L-DRYER</u>	Meter Coefficient (Y_d):	<u>1.0099</u>	dimensionless
Control Equip:	<u>Baghouse</u>	Stack Diameter:	<u>37.47</u>	inches
Permit Limits:	<u>N/A</u>	Stack Outlet Area (A_s):	<u>7.658</u>	square feet

L-DRYER Method 5

	Symbol	Dimension	Run 1	Run 2	Run 3	<Averages>
Test Date			10/7/98	10/7/98	10/7/98	
Test Time			17:25-18:39	19:53-21:03	22:16-23:24	
Total PM10 Emission Rate	$ER_{(PM10)}$	lbs/hour	3.45	1.89	1.73	<2.36>
Total PM Emission Rate	$ER_{(t)}$	lbs/ hour	11.80	5.89	3.51	<7.07>
Total PM Emission Rate	$Er_{(t)}$	grains/ dscf	0.0498	0.0256	0.0156	<0.0303>
Total PM Emission Rate	$er_{(t)}$	mg/ dscm	113.9	58.56	35.69	<69.38>
Total PM weight gain	Tmg	milligrams	85.8	42.4	25.7	<51.3>
Front Half PM10 Emissions	$ER_{(PM10)}$	lbs/ hr	2.55	0.51	0.54	<1.20>
Front Half PM10 Percent	%PM10	percent	23.4%	11.3%	23.4%	<19.4%>
Front Half Emission Rate	$ER_{(f)}$	lbs/ hour	10.90	4.51	2.32	<5.91>
Front Half Emission Rate	$Er_{(f)}$	grains/ dscf	0.0460	0.0196	0.0103	<0.0253>
Front Half Emission Rate	$er_{(f)}$	mg/ dscm	105.18	44.75	23.61	<57.85>
Front Half weight gain	$FHmg$	milligrams	79.2	32.4	17.0	<42.9>
Corrected Sample Volume	$V_{m(std)}$	dscf	26.579	25.562	25.413	<25.851>
Corrected Sample Volume		dscm	0.753	0.724	0.720	<0.732>
Stack Gas Flow Rate	$Q_{s(std)}$	dscf/ min	27,649	26,856	26,225	<26,910>
Stack Gas Flow Rate	$Q_{s(Act)}$	acf/ min	37,618	36,915	36,326	<36,953>
Stack Gas Moisture	B_{ws}	%/ 100	0.0562	0.0563	0.0532	<0.0548>
Stack Gas Velocity	V_s	feet/ sec	81.87	80.34	79.06	<80.42>
Stack Pressure	P_s	inches Hg	27.37	27.36	27.35	<27.36>
Stack Temperature	T_s	°R	620.2	626.3	633.0	<626.5>
Stack Oxygen	%O ₂	%	20.30	20.30	20.30	<20.3>
Isokinetic Sample Rate	ISOK	%	104.0	103.0	104.8	<103.9>

Where:

$$ER_{(PM10)} = (ER_{(t)}) + (ER_{(f)}) - (ER_{(PM10)})$$

$$ER_{(PM10)} = (ER_{(t)}) * (\%PM10)$$

%PM10 = from concurrent Method 201A PM10 test

$$\text{lbs/ hour} = (\text{grains/ dscf}) * (\text{dscf/ minute}) * (60 \text{ minutes/ hour}) * (1 \text{ lb/ } 7,000 \text{ grains})$$

$$\text{grains/ dscf} = (0.001 \text{ grams/ milligram}) * (15.43 \text{ grains/ gram}) * (\text{mg}) / (V_{m(std)})$$

$$\text{milligrams/ dscm} = (35.31 \text{ dscf/ dscm}) * (\text{mg}) / (V_{m(std)})$$

$$\text{dscf/ min} = 3,600 * (\text{hour/ 60 minutes}) * (1 - B_{ws}) * V_s * A_s * T_{std} * P_s / (T_s * P_{std})$$

$$\text{acf/ min} = V_s * A_s * (60 \text{ sec/ minute})$$

Stack Gas Velocity (V_s) is calculated on each individual test run isokinetic calculation form.